

## ORIGINAL

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1	BEFORE THE ARIZONA CORPORATION COMMISSION				
2	<u>COMMISSIONERS</u> 2007	JAN 19	P # 36		
3	JEFF HATCH-MILLER, Chairman Z CORP COMMISSION WILLIAM A. MUNDELL DOCUMENT CONTROL MARC SPITZER MIKE GLEASON KRISTIN K. MAYES BARRY WONG				
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6	BIRGET WOILD				
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10	In the matter of:		Docket	No. S-20482A-06-0631	
11	EDWARD A. PURVIS and MAUREEN H. PURVIS, husband and wife		NOTICE OF VIDEOTAPED DEPOSITION PURSUANT TO		
12	1231 W. Shannon Chandler, Arizona 85224		RULE!	30(b)(6), ARIZONA S OF CIVIL PROCEDUF	₹E
13 14	GREGG L. WOLFE and ALLISON A.				
15	WOLFE, husband and wife 2092 W. Dublin Lane Chandler, Arizona 85224				
16	JAMES W. KEATON, Jr. and JENNIFE	ER	li de la companya de	Arizona Corporation Commission	
17	KEATON, husband and wife 11398 E. Whitehorn Drive, Apt. D			DOCKETED	
18	Scottsdale, Arizona 85255			JAN 19 2007	
19	ACI HOLDINGS, INC., a Nevada corporation 17650 N. 25th Avenue			DOCKETED BY	
20	Phoenix, Arizona 85023,			I NOS	
21	Respondents.				
22	THE STATE OF ARIZONA TO:	Rrian 4	C. McNeil		
23	THE STATE OF AMIZONA 10:	Execut	ive Directo		
24			a Corpora /. Washing	ntion Commission	
25			-	85007-2996	

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YOU ARE COMMANDED to produce the individual representative who is most 2 knowledgeable of the content of all evidence, documents, interviews and examinations 3 under oath obtained by the Arizona Corporation Commission pursuant to the investigation 4 of Edward A. Purvis, Maureen H. Purvis, Gregg L. Wolfe, Allison A. Wolfe, Nakami Chi 5 Group Ministries International, James W. Keaton, Jr., Jennifer Keaton and ACI Holdings, 6 7 Inc.. YOU ARE COMMANDED to produce the representative at the date, time and 8 place shown below to provide testimony as described in attached Exhibit A. 9 10 BEFORE WHOM APPEARANCE TO BE MADE: **Court Reporter** 11 Videographer 12 John M. O'Neal **Zachary Cain** 13 **February 5, 2007 DATE AND TIME OF APPEARANCE:** 14 15 10:00 a.m. TIME OF APPEARANCE: 16 PLACE OF APPEARANCE: **Quarles & Brady LLP** 17 Renaissance One Two North Central Avenue 18 Phoenix, Arizona 85004-2391 19 // // 20 // // 21 // 22 // // 23 // // 24 //

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1	Respectfully submitted this 19th day of January, 2007.
2	QUARLES & BRADY LLP Renaissance One,
3	Two North Central Avenue Phoenix, Arizona \$5004-2391
4	By 5
5	John Maston O'Neal Zachary Cain
6	Attorneys for Defendant Edward A. Purvis
7 8	ORIGINAL of the foregoing filed this 19th day of January, 2007:
9 10	Docket Control Arizona Corporation Commission 1300 West Washington Phoenix, AZ 85007
11 12	COPY hand-delivered this 19th day of January, 2007, to:
13 14 15	Brian C. McNeil Executive Director Arizona Corporation Commission 1300 West Washington Phoenix, AZ 85007
16	COPY mailed this 19th day of January, 2007, to:
17 18	Rachel Strachan Arizona Corporation Commission Attorney, Securities Division
19	1300 West Washington, 3rd Floor Phoenix, Arizona 85007
20	1000
21	Melley
22	An employee of Quarles and Brady LLP
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1. Testimony supporting the ACC's allegation that the actions taken by PURVIS, WOLFE and KEATON were for their own benefit and for the benefit of the marital community as referenced in ¶'s 2-10 of the ACC's Notice For Opportunity Of Hearing Regarding Proposed Order To Cease And Desist, Order for Restitution, For Administrative Penalties And For Other Affirmative Action.

- 2. Testimony supporting the ACC's allegation that PURVIS and WOLFE transacted business under the name Nakami Chi Group Ministries International ("NCGMI") referenced in ¶ 11 of the ACC's Notice For Opportunity Of Hearing Regarding Proposed Order To Cease And Desist, Order for Restitution, For Administrative Penalties And For Other Affirmative Action.
- 3. Testimony supporting the ACC's allegation that WOLFE is the "subscriber" for NCGMI referenced in ¶ 12 of the ACC's Notice For Opportunity Of Hearing Regarding Proposed Order To Cease And Desist, Order for Restitution, For Administrative Penalties And For Other Affirmative Action.
- 4. Testimony supporting the ACC's allegation that ACI Holdings, Inc. is a corporation referenced in ¶ 13 of the ACC's Notice For Opportunity Of Hearing Regarding Proposed Order To Cease And Desist, Order for Restitution, For Administrative Penalties And For Other Affirmative Action.
- 5. Testimony supporting the ACC's allegation that KEATON is the President, Treasurer and Director of ACI Holdings, Inc. and that PURVIS served as a Director referenced in ¶ 14 of the ACC's Notice For Opportunity Of Hearing Regarding Proposed Order To Cease And Desist, Order for Restitution, For Administrative Penalties And For Other Affirmative Action.
- 6. Testimony supporting the ACC's allegation that PURVIS and WOLFE offered and sold unregistered securities in the form of investment contracts, bridge loans and company stock involving NCGMI and ACI Holdings, Inc. to investors, within or from Arizona and other states referenced in ¶'s 16-19 and ¶'s 21-29 of the ACC's Notice For Opportunity Of Hearing Regarding Proposed Order To Cease And Desist, Order for Restitution, For Administrative Penalties And For Other Affirmative Action.
- 7. Testimony supporting the ACC's allegation that PURVIS and WOLFE represented to investors that the bridge loan investment funded short-term, high interest bridge loans to small companies and that the investments would be personally guaranteed

with an annual return of 24% referenced in ¶'s 30-34 of the ACC's Notice For Opportunity Of Hearing Regarding Proposed Order To Cease And Desist, Order for Restitution, For Administrative Penalties And For Other Affirmative Action.

- 8. Testimony supporting the ACC's allegation that PURVIS and WOLFE suggested to investors that they should refer to their investments as "donations" and that such funds were deposited into a bank account for NCGMI as referenced in ¶'s 33-34 of the ACC's Notice For Opportunity Of Hearing Regarding Proposed Order To Cease And Desist, Order for Restitution, For Administrative Penalties And For Other Affirmative Action.
- 9. Testimony supporting the ACC's allegation that PURVIS and WOLFE offered stock in ACI Holdings, Inc. including PURVIS' alleged misrepresentations to investors as referenced in ¶'s 35-41 of the ACC's Notice For Opportunity Of Hearing Regarding Proposed Order To Cease And Desist, Order for Restitution, For Administrative Penalties And For Other Affirmative Action.
- 10. Testimony supporting the ACC's allegation that PURVIS and WOLFE offered or sold unregistered securities as referenced in ¶'s 42-45 of the ACC's Notice For Opportunity Of Hearing Regarding Proposed Order To Cease And Desist, Order for Restitution, For Administrative Penalties And For Other Affirmative Action.
- 11. Testimony supporting the ACC's allegation that PURVIS and WOLFE offered or sold unregistered securities while not registered as dealers or salesmen as referenced in ¶'s 46-48 of the ACC's Notice For Opportunity Of Hearing Regarding Proposed Order To Cease And Desist, Order for Restitution, For Administrative Penalties And For Other Affirmative Action.
- 12. Testimony supporting the ACC's allegation that RESPONDENTS, in connection with the offer of sale of securities within or from Arizona, directly or indirectly: (i) employed a device, scheme or artifice to defraud; (ii) made untrue statements of material fact or omitted material facts; or (iii) engaged in transactions, practices or courses of business which operated as a fraud or deceit upon offerees and investors as referenced in ¶ 49 of the ACC's Notice For Opportunity Of Hearing Regarding Proposed Order To Cease And Desist, Order for Restitution, For Administrative Penalties And For Other Affirmative Action.
- 13. Testimony supporting the ACC's request for relief as referenced on Page 9 ¶'s 1-5 of the ACC's Notice For Opportunity Of Hearing Regarding Proposed Order To Cease And Desist, Order for Restitution, For Administrative Penalties And For Other

Affirmative Action including the identity of any offerees or investors allegedly harmed, the nature of the harm suffered, and the alleged amount of restitution due.